

EXHIBIT 2

-CAMPBELL & WILLIAMS' LETTER MOTION TO ADJOURN
HEARING DATED JULY 19, 2021-



July 19, 2021

Via CM/ECF

The Honorable Sanket J. Bulsara
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Schmitt v. China XD Plastics Co. Ltd., et al., No. 1:20-CV-06028

Dear Judge Bulsara:

We represent Defendants Jie Han, Faith Horizon, Inc., Faith Dawn Limited, and XD Engineering Plastics Co. (the “Buyers Group Defendants”). We write regarding your minute order dated July 18, 2021, which set a hearing date on our firm’s Motion to Withdraw as Counsel of Record for August 2, 2021 at 10:00 a.m. Eastern Time. Per Your Honor’s instruction, we have served the minute order on Defendant Han, and will be separately filing proof of service thereof.

Notwithstanding the foregoing, we submit this letter brief pursuant to Local Rule 7.1(d) in support of our motion for a short continuance of the August 2 hearing date or, at a minimum, a short adjournment of the hearing to a time later that same day. I have been primary counsel of record for the Buyers Group Defendants in this action. I am going to be in Hawaii on August 2, 2021 for my brother’s wedding, which is scheduled to occur the prior evening of August 1, 2021. As presently set, the August 2 hearing will occur at 4:00 a.m. Hawaii time the night after the wedding. I am scheduled to return to Las Vegas, Nevada on August 2, 2021 via a flight leaving at 3:00 p.m. Hawaii time. Accordingly, I would be free to participate in the hearing on any day from August 3-6. Alternatively, if the Court wishes to keep the hearing on August 2, I would request that it be heard later in the day, if possible.

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Hon. Sanket J. Bulsara
United States Magistrate Judge
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Should the Court be willing to adjourn the hearing date/time, we will of course provide prompt notice to the Buyers Group Defendants whose representative is being copied on this letter brief. Thank you for your consideration.

Very truly yours,

CAMPBELL & WILLIAMS

A handwritten signature in blue ink, appearing to read "J. Colby Williams", with a large, stylized flourish extending from the end of the signature.

J. Colby Williams ,Esq.

JCW/

cc: Counsel for Plaintiffs/Defendants (by CM/ECF)
Mr. Jie Han (by email)